

Exhibit D
(Hana April 16 Notice)



Lawrence S. Lustberg

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April 16, 2024

VIA EMAIL

Eli J. Mark, Esq.
Paul Monteleoni, Esq.
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Assistant U.S. Attorneys
Southern District of New York
One St. Andrew's Plaza
New York, New York 10007

**Re: *United States of America v. Menendez, et al.*
Dkt. No. 23-cr-490-SHS**

Dear Counsel:

As you know, this firm represents Wael Hana in the above-referenced case. I write to provide disclosure pursuant to Federal Rule of Criminal Procedure 16(b)(1)(C), your request of April 2, 2024, and the agreement of the parties, with regard to certain potential expert testimony that the defense may offer in its case-in-chief at trial. Specifically, attached to this letter are disclosures for Jon B. Alterman, Ph.D. and Alex Own. Although Mr. Hana does not believe that disclosure is necessary at this time as to Alex Own because the defense team is still not in receipt of final transcripts from the Government or any proposed stipulations pertinent thereto, he makes this disclosure of a potential translation expert out of an abundance of caution and in order to maximize notice to the Government and the other Defendants. Mr. Hana reserves the right to supplement this notice with additional information concerning these potential experts and/or notice of additional potential expert witnesses, as warranted by future case developments and Government disclosures and productions.

Sincerely yours,

A handwritten signature in blue ink, consisting of a stylized 'L' and 'S' intertwined.

Lawrence S. Lustberg

Jon B. Alterman

[REDACTED], Bethesda MD 20814
+1. [REDACTED] [REDACTED]@gmail.com

Professional Experience

Center for Strategic and International Studies, Washington, DC. *Senior Vice President*, June 2014-present, *Zbigniew Brzezinski Chair in Global Security and Geostrategy*, February 2012-present, and *Director and Senior Fellow, Middle East Program*, November 2002-present.

- Help lead \$45 million, 220-employee organization.
- Create and lead 8-person team executing research agenda in Middle East affairs.
- Brief and partner with senior leaders from government, business and diplomacy.
- Raised more than \$25 million (now \$1.8m annually) from foundations, individuals, corporations, and U.S. and foreign government sources.
- Designed, marketed and delivered \$4 million+ in executive education programming.

U.S. Department of State, Washington, DC. *Member*, Policy Planning Staff and *Special Assistant to the Assistant Secretary*, Bureau of Near Eastern Affairs (as Council on Foreign Relations International Affairs Fellow), October 2001-October 2002.

- Provided strategic advice to Director of Planning Staff, Assistant Secretary, and Secretary of State, and drafted speeches on behalf of senior State Department officials.
- Led execution of conference in Cairo for 70 Foreign Service Officers from 40 countries.

United States Institute of Peace, Washington, DC. Research and Studies Program. *Program Officer*, August 1998-October 2001.

- Conceptualized and executed policy-relevant studies.
- Consulted to various branches of U.S. government.

Washington Institute for Near East Policy, Washington, DC. *Soref Fellow*, September 1997-July 1998.

- Wrote *New Media, New Politics? From satellite television to the Internet in the Arab world*.
- Edited and wrote introduction for *Sadat and His Legacy: Egypt and the world, 1977-1997*.

Harvard University, Cambridge, MA. *Teaching Fellow*, *Head Teaching Fellow* and *Tutor*, 1993-97.

- Administered, coordinated and occasionally lectured to 180-student, six-instructor course.
- Taught own honors seminars, led discussion sections, and served as Arabic drill instructor.

Office of Senator Daniel P. Moynihan, Washington, DC. *Legislative/Research Assistant*, 1987-89. Responsible for issues related to foreign policy, defense and intelligence.

Teaching:

- Middle East politics as adjunct professor at SAIS, GWU, and Syracuse, 2004-present.
- Skills courses at CSIS for approximately 350 adult learners, 2007-present.

Education

Harvard University, Ph.D. in History, 1997, A.M. in History, 1991.

Columbia University, M.A. in History, 1990.

Princeton University, A.B. with honors in Public and International Affairs, 1987.

Selected Publications:

Sustainable States: Environment, Governance, and the Future of the Middle East (with Natasha Hall and Will Todman) (Washington: CSIS, 2021)
Ties That Bind: Family, Tribe, Nation, and the Rise of Arab Individualism (Washington: CSIS, 2019)
Restoring the Eastern Mediterranean as a U.S. Strategic Anchor (co-author), (Washington: CSIS, 2018)
Independence Movements and their Aftermaths: Self-determination and the struggle for success (ed., with Will Todman) (Lanham, MD: Rowman and Littlefield, 2018)
Citizens in Training: Conscription and Nation Building in the UAE (with Margo Balboni) (Lanham, MD: Rowman and Littlefield, 2017)
Rocky Harbors: Taking stock of the Middle East in 2015 (ed.) (Washington: CSIS, 2015)
Religious Radicalism after the Arab Uprisings (ed.) (Lanham, MD: Rowman and Littlefield, 2015)
Egypt and American Foreign Assistance, 1952-1956: Hopes dashed (New York: Palgrave, 2002).
New Media, New Politics?: From satellite television to the Internet in the Arab world (Washington: Washington Institute for Near East Policy, 1998).
Sadat and His Legacy: Egypt and the World, 1977-1997 (ed.) (Washington: Washington Institute for Near East Policy, 1998)

"A Détente Option for Iran," *Foreign Affairs*, April 3, 2024.
"The 'China Model' in the Middle East," *Survival*, vol. 66 no. 2 (April/May 2024)
"How the Rise of Individualism Is Upending the Middle East," *Washington Post* (Outlook section), December 20, 2019
"This Revolution Isn't Being Televised," *New York Times*, December 31, 2011.
"Free Markets, Free Muslims" (book review), *Foreign Affairs*, November/December 2009.

Congressional Testimony:

A Strategic Approach to Red Sea Security, House Foreign Affairs Committee, February 14, 2024.
Chinese Influence in the Middle East, House Foreign Affairs Committee, May 9, 2019.
Potential Regional Implications of the Iran Nuclear Deal, House Armed Services Committee, July 29, 2015
Bad Options and Hard Choices in Syria Policy, House Foreign Affairs Committee, June 5, 2013.
The Revolution in Egypt: Turning Point? House Foreign Affairs Committee, June 20, 2012
Syria: U.S. Policy Options, Senate Foreign Relations Committee, April 19, 2012.

Lectures:

Hundreds of lectures in more than 35 countries on five continents.

Honors and Awards

Gary Baumgartner Award for Sustained Contributions to CSIS (2022), Scholar in Residence, Chautauqua Institution (2014), CSIS Brzezinski Chair (2012-present), International Affairs Fellowship, Council on Foreign Relations (2001-02), Harvard Certificate for Distinction in Teaching (1994, 1996), Jacob K. Javits Graduate Fellowship, U.S. Department of Education (1990-92, 1993-95), Foreign Language and Area Studies fellowship (two years and two summers), American Research Center in Egypt Traveling Fellowship (1994-95).

Activities and Memberships

Member, Editorial Advisory Board, *Arab Media and Society*
Member, Council on Foreign Relations
Member, Expert Working Group, Iraq Study Group (Baker-Hamilton Commission, 2006)
Member, Chief of Naval Operations Executive Panel (2009-2021)

Vice Chair (2020-2021) and board member (2017-2019), Shepherd's Table, Silver Spring, MD (soup kitchen serving 180,000+ meals/year)

- Chair, Executive Search Committee; Chair, Personnel Committee; member, Executive Committee and Finance Committee

President, Parkview Citizens' Association (2004-2010; 2013-2017)

Overseas Experience

Highly proficient in spoken and written Arabic. Two years residence in Egypt for language study and field research. Additional research travel to every Middle Eastern country, Europe, Turkey, Russia, India, China.

References

Available upon request

Disclosure as to Potential Expert Witness Jon B. Alterman, Ph.D.

Dr. Alterman has directed the Middle East Program at the Center for Strategic and International Studies, a major Washington think tank, since 2002. He first traveled to Egypt in 1991, and thereafter lived in the country during the early 1990s, returning at least annually until 2016. He speaks Egyptian-colloquial Arabic, and he has maintained close ties with Egyptian government officials, academics, and businesspeople throughout his association with the country. He served as an observer to Egypt's 2011 elections and has intimate familiarity with personnel at the highest levels of Egyptian government, including both President Sisi and senior Egyptian military officers. He would testify about the historical context in which Mr. Hana obtained and has maintained IS EG Halal's contract, which the Government contends occurred as a result of bribery and corruption due to Mr. Hana's relationship with Senator Menendez and his wife. Dr. Alterman, however, will show that this occurred at a time when the Egyptian government under President Abdel Fatah el-Sisi sought to eradicate the Muslim Brotherhood, including by eliminating Muslim Brotherhood-operated and owned businesses and rerouting those assets to non-Muslim Brotherhood affiliated entities and individuals. That history explains the circumstances under which Mr. Hana, a Coptic Christian, replaced Muslim Brotherhood business owners with respect to the Halal contracts at issue.

As an academic researching the period around Egypt's 1952 revolution, Dr. Alterman met many of the so-called "Free Officers" who led the revolution, and he studied and would be able to opine on the way in which the military pushed aside the civilian government in April 1955 and has ruled Egypt with only brief interruption since then, including that the military is now the largest single economic actor in Egypt. The military's economic interests are wide and deep, and it is not uncommon for military officials to be involved in contracting and private business ventures, also an important issue in this case.

Specifically, Dr. Alterman, who was in Egypt several times in the months following the 2011 revolution, will opine on the military's efforts to contain the Muslim Brotherhood after its electoral success, followed by overt moves against the Brotherhood in July 2013 to remove their power, including economic power. Dr. Alterman will also be able to explain the efforts of the Egyptian government to strip the organization's economic resources by attacking Brotherhood-affiliated enterprises, confiscating some and pushing others out of business.

As noted above, and as more fully described in his CV, Dr. Alterman's qualifications include his current role at the Center for Strategic and International Studies in Washington, D.C. (2002 – current), where Dr. Alterman is the Senior Vice President, Zbigniew Brzezinski Chair in Global Security and Geostrategy, and Director and Senior Fellow in charge of managing a dedicated Middle Eastern affairs research team, among other leadership responsibilities. Dr. Alterman has also been a Council on Foreign Relations International Affairs Fellow at the U.S. Department of State (2001-2002), and

has taught Middle East politics as an adjunct professor at George Washington University and Syracuse University since 2004. Dr. Alterman graduated from Princeton University with an A.B. with Honors in Public and International Affairs, from Columbia University with an M.A. in history, and from Harvard University with an A.M. and Ph.D. in history. Dr. Alterman has spoken, researched (including doing field research in Egypt), and written extensively on the Middle East and Egypt in the form of lectures, panels, articles, chapters of books, and non-fiction publications, including *Egypt and American Foreign Assistance, 1952-1956: Hopes Dashed* (Palgrave, 2022). Dr. Alterman has testified before Congress on matters of foreign policy several times, including in 2012 on the topic of the Egyptian revolution. Dr. Alterman is a member of the Editorial Advisory Board of Arab Media and Society, and a member of the Council on Foreign Relations.

Within the previous four years, Dr. Alterman has not testified as an expert in any trial or deposition to the best of his recollection.

/s/

Dr. Jon B. Alterman

Phone +1 [REDACTED]
E-mail [REDACTED]@yahoo.com

Alex Own

Work experience

[Feb 05 - *current*]

Linguist, interpreter, translator freelance

- Conference Interpretation
- Consecutive Translation (meetings, workshops, legal depositions, medical appointments, etc.)
- Written Translation (including post-editing for machine translation)

[Jun 1999 - *current*] freelance

Private tutor (TAFL)

- Teaching Arabic as a foreign language

[Aug 15 - Jan 16]

The United Nations

New York

Arabic Interpreter

- Consecutive and simultaneous interpretation in all types of meetings

[Aug 09 - Jan 11]

Science Valley University

Egypt

Lecturer

- Lecturing university students on Linguistics, and ELA

[Jun 03 - May 05] Language & Computer Integrated Assoc. (L.C.I.A.)

Language Instructor (TEFL)

- Teaching English as a foreign language

[Aug 02 - Apr 03]

Xceed Contact Center

Cairo

Tier-2 Technical Support Agent

Microsoft Xbox account (outbound \ inbound)

- Providing full service for customers in the **UK**

[Aug 01 - Jul 02] Education & Training Experts Association

Cairo

Language Instructor (TEFL)

- Teaching English as a foreign language

Education

- | | | |
|--|-------------------|-------|
| [2000 - 2001] | Helwan University | Cairo |
| Faculty of Commerce and Business Administration | | |
| ▪ Completed 1 st . year, <i>Good</i> | | |
| | | |
| [2001- 2005] | Helwan University | Cairo |
| Faculty of Arts, English Dept. | | |
| • B.A. in Linguistics and Translation | | |
| • Overall grade <i>very good</i> | | |
| • Studied Italian as a second Language for 2 years | | |

The American University in Cairo

- Conference Procedures
- UN Manual for Arabic Translators
- Research Tools for Translators
- Specialist Terminology
- Simultaneous Interpreting into English IV
- Simultaneous Interpreting into Arabic IV
- Consecutive & At sight Translation II, III, and IV

Above courses are part of the PSI's (Professional Certificate in Simultaneous Interpreting) and PWT's (Professional Certificate in Written Translation) mini certificates:

- Legal and UN Translation (LUT)
- The Conference Interpreter (TCI)
- Groundwork in Simultaneous Interpreting (GSI)
- Developing Skills in Simultaneous Interpreting (DSI)
- Groundwork in Written Translation (GWT)

Languages

Arabic – Native

English – Fluent

Disclosure as to Potential Expert Witness Alex Own

If necessary based upon final translations and possible stipulations, which have not yet been received from the Government, Alex Own, a trained linguist, interpreter, and translator, may be called upon to testify regarding Arabic-language translations, including certain documents and electronic communications that are, in whole or in part, in Arabic. The Government has similarly indicated it expects to introduce materials containing Arabic speech and/or text¹ and has disclosed a potential language specialist it may call to testify regarding Arabic-language translations of these materials. Mr. Hana's proposed language specialist, Mr. Own, is expected to testify regarding Arabic-language translations of such evidence. Mr. Own may also testify regarding certain Arabic terms that may be used or referenced in other items of evidence or witness testimony.

Mr. Own has worked as an Arabic-English linguist, interpreter, and translator for nineteen years. He is a native Arabic speaker and is fluent in English. He completed Bachelors and Masters degrees at Helwan University in Cairo, Egypt. Mr. Own translates documents, audio recordings, and video recordings, and also interprets meetings, conferences, workshops, and legal depositions. He trained in Simultaneous Interpreting into English and Arabic, Legal and United Nations Translation, and other specialized fields as part of Professional a Certificate Program in Simultaneous Interpreting and Written Translation at the American University in Cairo. He has had contracts to do translations for the United Nations, educational institutions in Egypt, and various private sector companies using his Arabic-English interpretation services.

During the previous four years, Mr. Own has testified as an expert one time, in *United States v. Alshahhi, et al.*, 1:21-cr-371-BMC-TAM (E.D.N.Y.).

/s/
Alex Own

¹ Gov't Disclosure as to Potential Expert Witness Nehad Abusuneima, Apr. 2, 2024.